

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In Re: § Case No. 24-70132
Mari Moncada, §
Debtor § Chapter 13
 §

DEBTOR'S MOTION TO CONVERT TO CHAPTER 7

TO THE HONORABLE JUDGE OF SAID COURT:

Debtor moves to convert the above-referenced case to a chapter 7 case, and in support thereof, states as follows:

1. On May 31, 2024, Debtor, Mari Moncada, filed a voluntary petition for bankruptcy relief in the above-referenced case under Chapter 13 of the United States Bankruptcy Code.
2. Pursuant to 11 U.S.C. § 1307(a), the Debtor(s) may convert this case to a case under chapter 7 “at any time.” The Debtor(s) elect to convert this case to a case under chapter 7 effective on or before the 38th day following the filing of this motion.
3. Pending the conversion, the Debtor(s) seek to suspend all payment obligations to the chapter 13 trustee.
4. The Debtor(s) require the assistance of counsel for the conversion. Accordingly, the Debtor(s) request that funds on deposit with the chapter 13. The Debtor(s) request that the disbursements up to the sum of \$0.00 out of available funds from the chapter 13 trustee as payment to counsel for post-conversion services.

Dated: 08/01/2024

Respectfully submitted,

Resolve Law Group,
a registered dba of Price Law Group, A.P.C.

By: /s/ Amy Bates Ames
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Attorney for Debtor

CERTIFICATE OF SERVICE

The undersigned certifies that on the August 2, 2024, a copy of the foregoing Objection was filed electronically and served electronically and/or regular, first class U.S. mail, postage prepaid, to the Debtor, Chapter 13 Trustee, to the following attorney for the Movant, to any attorney or party in interest requesting notices in the above-referenced case, and to each party on the attached service list.

/s/ Amy Bates Ames
Amy Bates Ames